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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In Re DMCA Subpoena to Vilmi Henri
Kalle Johannes CORPORATION and
Internet Domain Service BS Corp.

Case No.:

**Petitioner's Request to the Clerk of
Courts Pursuant to 17 U.S.C.
512(h) for Issuance of Subpoena to
Vilmi Henri Kalle Johannes
CORPORATION and Internet
Domain Service BS Corp to Identify
Alleged Infringers**

Petitioner Gerben Law Firm ("Petitioner") files this request asking the Clerk of Court to issue subpoenas to Vilmi Henri Kalle Johannes CORPORATION (also known as OrangeWebsite.Com) ("OrangeWebsite.com") and Internet Domain Service BS Corp. (also known as InternetBS) ("InternetBS") for the narrow purpose of identifying the alleged infringer(s) pursuant to the Digital Millennium Copyright Act (the "DMCA"), 17 U.S.C. § 512(g). The proposed DMCA subpoenas are attached hereto as Exhibit A.

Petitioner directs this action at OrangeWebsite.com and InternetBS, seeking information concerning www.gerbentrademark.com, a website that posted content that infringed the copyrights held by Petitioner.

1 Petitioner has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C.
2 512(h), namely: (1) Petitioners have submitted copies of the notifications they sent to Vilmi
3 Henri Kalle Johannes CORPORATION and Internet Domain Service BS Corp. pursuant to 17
4 U.S.C. § 512(c)(3)(A) attached hereto as Exhibit A to the Gerben Declaration; (2) Petitioners
5 have submitted the proposed DMCA subpoena concurrently herewith as Exhibit A; and (3)
6 Petitioners have submitted a sworn declaration confirming that the purpose for which the DMCA
7 subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such
8 information will only be used for the purpose of protecting Petitioners' rights under Title 17
9 U.S.C. § 512(h)(2). Petitioner submits the declaration of Joshua M. Gerben in support of
10 compliance with the above notification procedure.
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13 As Petitioner has satisfied the requirements under 17 U.S.C. 512(g), Petitioners asks the
14 Clerk of Courts to issue and sign the proposed subpoenas and return to Petitioner's undersigned
15 counsel for service.
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18 Dated: May 18, 2018

GERBEN LAW FIRM, PLLC

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21 Eric Perrott, Esq.
22 Attorney for Plaintiffs
23 Gerben Law Firm, PLLC
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